

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

AMANDA STEWART and  
BRIAN BIEZINSKI,  
Plaintiffs,

V.

CONNALLY INDEPENDENT SCHOOL DISTRICT, real persons WESLEY HOLT, THURMAN BROWN, and JOHN SIMPSON, in their individual and official capacities,

Defendants.

**§ § § § § § § § § §**

CIVIL ACTION NO. 6:23-cv-0332

## APPENDIX TO NOTICE OF REMOVAL

Ex. A. Documents in State Court file, Cause No. 2022-4213-4; *Amanda Stewart and Brian Biezinski v. Connally Independent School District, et al.*; In the 170th Judicial District Court, McLennan County, Texas

**EXHIBIT A**

**DOCUMENTS IN STATE COURT FILE**

1. Court's log of District Defendants' request for certified copies
2. Docket Sheet
3. Plaintiffs' Original Petition
4. Request for Issuance of Service on each defendant
5. Service Issued for each defendant
6. Affidavits of Service for Wesley Holt, Wesley Holt as Superintendent of Connally ISD, and John Simpson

## Case

Case Number  
2022-4213-4

Location  
McLennan County - District Clerk

Case Type  
Other Civil

Filed Date

Description

Category  
Civil - Other Civil

Status

Judge

FILED  
2023 APR 24 PM 1:02  
*[Signature]*

## Envelope # 74916500

Submit Date  
04/21/2023 5:09 PM CDT

Filing Source  
MyFileRunner

Filed By  
Todd A Clark

Firm Address  
P. O. Box 2156  
Austin, Texas 78768

Filer Email  
[tclark@wabsa.com](mailto:tclark@wabsa.com)

Docket Date  
04/21/2023 5:09 PM CDT

Filing Attorney  
Todd A Clark

Firm Name  
Walsh Gallegos Trevino Kyle & Robinson P.C.

Firm Phone  
512-454-6864

Filer Type  
Not Applicable

## Existing Parties

6 Parties

Party Type	Party Name	Lead Attorney
Plaintiff	Amanda Stewart	Raymond L Sanders
Plaintiff	Brian Biezenski	Raymond L Sanders
Defendant	Connaly Independent School District	
Defendant	Wesley Holt	
Defendant	Thurman Brown	
Defendant	John Simpson	

## Filings

1 Filing(s)

## Request

Status  
Accepted By Court

Reference Number  
05310-085

Filing Comments

Filing Type  
EFileAndServe

Filing Description  
Request for Certified Copies

Filing Courtesy Copies

Review Date  
04/24/2023 8:49 AM CDT

Accept Comments

## Documents

Component Document Name Description Security Download Version

Lead Document 4-21-23 Ltr clerk req cert copy.pdf Letter requesting certified copies Original Transmitted

## Service

1 Party(s) with Service

Search by Party Name

Search by Service Contact

SEARCH

RESET

Other

3 Service Contact(s)

## Parties with no Contacts for Service

6 Party(s) without Service

Search by Party Name

SEARCH

RESET

Party Name	Email Address	Address
Biezenski, Brian		103 Adrian Dr, Robinson, Texas 76706
Brown, Thurman		
Connaly Independent School District		
Holt, Wesley		
Simpson, John		
Stewart, Amanda		110 Rocky Creek Ave, Groesbeck, Texas 76642

## Fees

### Description of Fees and Amounts

#### Request

Filing Fee	\$0.00
Copies - Certified (87 x \$1.00)	\$87.00
<b>Filing Total:</b>	<b>\$87.00</b>

#### Total Fees

Total Filing Fees	\$87.00
Payment Service Fee	\$2.72
Provider E-File Fee	\$6.50
Provider Tax	\$0.54
<b>Envelope Total:</b>	<b>\$96.76</b>

### Payment Information

Payment Account  
03-MyFileRunner Billing 02-27

Payment Type  
CreditCard

Party Responsible for Fees  
Connaly Independent School District

Order ID  
074916500-0



Transaction Amount

\$96.76

Transaction ID

110246920

Transaction Response

Payment Complete

CLOSE

## MCLENNAN DISTRICT CLERK

501 Washington Avenue, Suite 300 Annex

Waco, TX, 76701

PHONE #: (254) 757-5057

FAX: N/A

## DOCKET SHEET - CIVIL CASE

DOCKET NO. : 2022-4213-4

CASE STATUS: PENDING FILED DATE: 12/12/2022

TJC CODE : ALL OTHER (

STYLE : AMANDA STEWART, ET AL Vs CONNALLY ISD, ET AL

DISPOSITION :

DISPOSED : N/A

TJC CODE :

TYPE	PARTY	ATTORNEY
PLAINTIFF	AMANDA STEWART	RAYMOND L. SANDERS
	0	107 S. RAILROAD STREET GROESBECK TX '
PLAINTIFF	BRIAN BIEZENSKI	RAYMOND L. SANDERS
	0	107 S. RAILROAD STREET GROESBECK TX '
DEFENDAN	CONNALLY ISD	
	200 CADET WAY WACO TX 76705	0
DEFENDAN	WESLEY HOLT	
	200 CADET WAY WACO TX 76705	0
DEFENDAN	THURMAN BROWN	
	203 FROST CREEK 0	0
DEFENDAN	JOHN SIMPSON	
	212 NORTHWOOD BLVD 0	0

## HEARING NOTES : 2022-4213-4

DATE	TEXT
12/12/2022	PLAINTIFFS' ORIGINAL PETITION
12/13/2022	E-FILE INFORMATION SHEET
04/03/2023	REQUEST FOR ISSUANCE
04/03/2023	REQUEST FOR ISSUANCE
04/03/2023	REQUEST FOR ISSUANCE
04/03/2023	REQUEST FOR ISSUANCE
04/04/2023	E-FILE INFORMATION SHEET
04/04/2023	CITATION ISSUED TO CONNALLY ISD
04/04/2023	CITATION ISSUED TO JOHN SIMPSON
04/04/2023	CITATION ISSUED TO THURMAN BROWN
04/04/2023	CITATION ISSUED TO WESLEY HOLT
04/11/2023	RETURNED CITATION- CONNALLY ISD
04/11/2023	RETURNED CITATION- WESLEY HOLT
04/12/2023	E-FILE INFORMATION SHEET
04/21/2023	Request for Certified Copies
04/24/2023	Affidavit of Service

The State of Texas  
County of McLennanI, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this 8th day of May, 2023.A.D. 2023  
Jon R. Gimble  
McLennan County, Texas  
By [Signature] DeputyCERTIFIED DOCUMENT  
PAGE 1 OF 1  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

2022-4213-4  
 NO. \_\_\_\_\_

AMANDA STEWART & § IN THE DISTRICT COURT  
 BRIAN BIEZENSKI §  
 v. §  
 §  
 §  
 CONNALY INDEPENDENT SCHOOL § 170TH  
 DISTRICT, real persons, WESLEY §  
 HOLT, THURMAN BROWN, & JOHN §  
 SIMPSON, in their individual & official §  
 capacities § MCLENNAN COUNTY, TEXAS

**PLAINTIFFS' ORIGINAL PETITION**

**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Amanda Stewart and Brian Biezenski, hereinafter called Plaintiffs, complaining of and about Connaly Independent School District, Wesley Holt, Thurman Brown, and John Simpson, Defendants, and for cause of action shows unto the Court the following:

**JURISDICTION**

1. Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17. Notice of Right to Sue letter from the Equal Employment Opportunity Commission for both Plaintiffs are attached as Exhibits A-B.
2. In determining whether state courts are allowed to entertain jurisdiction over federally created causes of action, the Supreme Court has applied a presumption of concurrency. *See, e.g., Robb v. Connolly*, 111 U.S. 624 (1884); *Claflin v. Houseman*, 93 U.S. 130, 136 (1876); *see generally* Martin H. Redish & John Muench, *Adjudication of Federal Causes of Action in State Court*, 75 Mich. L. Rev. 311 (1976). Under this presumption, state courts may exercise jurisdiction over federally created causes of action as long as Congress has not explicitly or

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implicitly made federal court jurisdiction exclusive. *Yellow Freight System, Incorporated v. Donnelly*, 494 U.S. 820, 822 (1990). Congress may, of course, expressly permit state courts to entertain certain federal claims. State courts are authorized to hear claims arising under the Fair Labor Standards Act, 29 U.S.C. § 216(b), the Equal Pay Act, 29 U.S.C. § 206, the Age Discrimination in Employment Act, 29 U.S.C. § 626(c)(1), and Title VIII actions involving housing discrimination, 42 U.S.C. § 3613(a). State courts have concurrent jurisdiction over Title VII claims. *Yellow Freight System, Incorporated*, 494 U.S. at 820.

### VENUE

3. Venue is proper in McLennan County under Texas Civil Practice & Remedies Code section 15.002 because all or a substantial part of the events or omissions giving rise to the claim occurred in McLennan County.

### PARTIES AND SERVICE

4. Plaintiff, AMANDA STEWART resides in Limestone County, Texas. The last three numbers of AMANDA STEWART's driver's license number are TX \*\*\*\*\*428. The last three numbers of AMANDA STEWART's Social Security number are \*\*\*-\*\*-\*. At all times relevant to this action, AMANDA STEWART was a teacher working at Connally Independent School District in Waco, Texas—a public school, a citizen of the United States, and a person entitled to the protection of the Education Amendments of 1972 as amended and the Civil Rights Restoration Act of 1987.

5. Plaintiff, BRIAN BIEZENSKI resides in McLennan County, Texas. The last three numbers of BRIAN BIEZENSKI's driver's license number are TX \*\*\*\*\*278. The last three numbers of BRIAN BIEZENSKI's Social Security number are \*\*\*-\*\*-\*. At all times relevant to this action, AMANDA STEWART was a teacher working at Connally Independent



School District in Waco, Texas—a public school, a citizen of the United States, and a person entitled to the protection of the Education Amendments of 1972 as amended and the Civil Rights Restoration Act of 1987.

6. Defendant CONNALLY INDEPENDENT SCHOOL DISTRICT controls and manages the public-school defendant in Waco, Texas. No service on Respondent is necessary at this time.

7. Defendant, WESLEY HOLT is, and at all times material hereto was, an individual working as an employee and agent for Defendant CONNALLY INDEPENDENT SCHOOL DISTRICT as Superintendent. This action is brought against WESLEY HOLT, both individually and also in his official capacity. No service on Respondent is necessary at this time.

8. Defendant THURMAN BROWN is, and at all times material hereto was, an individual working as an employee and agent of Defendant CONNALLY INDEPENDENT SCHOOL DISTRICT as principal of the CONNALLY INDEPENDENT SCHOOL DISTRICT. This action is brought against THURMAN BROWN, both individually and also in his official capacity. No service on Respondent is necessary at this time.

9. Defendant JOHN SIMPSON is, and at all times material hereto was, an individual working as an employee and agent of Defendant CONNALLY INDEPENDENT SCHOOL DISTRICT as an educator of the CONNALLY INDEPENDENT SCHOOL DISTRICT. This action is brought against JOHN SIMPSON, both individually and also in his official capacity. No service on Respondent is necessary at this time.

10. Defendant CONNALLY INDEPENDENT SCHOOL DISTRICT is duly organized and existing under the laws of the State of Texas and receives federal financial assistance for its

public education program. The defendant school district was deliberately indifferent to the safety of women when it hired defendant JOHN SIMPSON. Once defendant JOHN SIMPSON was hired by, the Defendant school district's ratification of conduct and failure to respond to Plaintiffs' complaints or stop such harassment despite their duty to do so and despite Plaintiffs' request and pleas, created an intimidating, hostile, offensive, and abusive school environment in violation of Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681 et seq. No service on Respondent is necessary at this time.

### FACTUAL ALLEGATIONS

11. JOHN SIMPSON was fired from Corsicana ISD as assistant principle for engaging in inappropriate sexual conduct with a female student. After that he was hired by Ennis ISD whereas once again, he was fired for engaging in inappropriate sexual conduct with a student and for having an affair with another school administrator.

12. JOHN SIMPSON'S teacher's certification was suspended for a year but was reinstated in 2017.

13. After getting his teacher's certification back, JOHN SIMPSON signed a teaching contract with Mexia ISD but shortly thereafter, the Mexia ISD asked him to resign and the district paid him for the year but made him leave. He then went to work at Connally ISD as an assistant principle at the Connally Junior High School.

14. In May of 2018, an educator by the name of Stephanie Gober who worked as a counselor at Connally Junior High, reported to Larry Cumby who is the Human Resource Director at Connally ISD, that John Simpson had been sending her inappropriate messages. Stephanie Gober resigned her position at Connally ISD and went to work at Whitney ISD.

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15. In May of 2018, John Simpson began sending nude pictures of himself and his wife to Amanda Stewart. And although Amanda Stewart sent John Simpson a message and asked him to stop, the messages continued. At one point John Simpson sent a very graphic video of him and his wife having sex to Amanda Stewart.

16. On May 22, 2018, Brian Biezenski went to the principal Thurman Brown a reported the sexual harassment complaints that he had received on John Simpson from Amanda Stewart and others faculty members. Brian Biezenski recorded that conversation on his phone.

17. On May 23, 2018, Brian Biezenski sent an email to Thurman Brown documenting the substance of the meeting.

18. On May 24, 2018, Brian Biezenski was placed on administrative leave and escorted out of the building by campus police as retaliation for reporting the sexual harassment of Amanda Stewart.

19. When the 2018- 2019 school year resumed after summer break, so did the sexual harassment by John Simpson. The message continued along with the pictures.

20. On November 1, 2018, John Simpson came to Amanda Stewart's class while lessons were in progress and began sending nude pictures and in appropriate message while Amanda Stewart was trying to teach class.

21. On November 2, 2018 John Simpson asked Amanda Stewart to come to the bathroom with him.

22. In December 2018 Amanda Stewart's 14 plus year relationship with her boyfriend ended as a result of this whole ordeal she endured at Connally ISD Junior High School.

23. Both Plaintiffs Amanda Stewart and Brian Brian Biezenski have suffered, and will continue to suffer, serious mental health problems, including but not limited to, depression, fear,



anxieties, inability to function normally in social situations, both in relationships with adults and relationship with peers.

24. As a proximate result of these acts of Defendants, Plaintiffs Amanda Stewart and Brian Biezenski are in need of treatment for the mental health issues and medical issues they have suffered and will continue to suffer, and they seek damages in the form of cost for these expenses now and in the future, and general damages in an amount that has not been ascertained and that will be proven at trial.

25. The conduct of the individual Defendants was an intentional, oppressive, malicious and/or in wanton disregard of the rights and feelings of Plaintiff Amanda Stewart and Brian Biezenski and constitute despicable conduct, and by reason thereof, Plaintiff Amanda Stewart and Brian Biezenski demands exemplary or punitive damages against the Defendants, in an amount appropriate to punish or make an example of them.

### **COUNT I.**

#### **Sex Discrimination Pursuant to Title VII of the Civil Rights Act of 1964 as codified, 42 U.S.C. §§ 2000e to 2000e-17. (Against All Defendants)**

26. Plaintiff Amanda Stewart realleges and incorporates by reference 1 through 24. All Defendants intentionally, willfully and without justification acted to deprive Plaintiff on the grounds of her sex, of her rights, privileges and immunities secured by the laws of the United States, particularly her right to be free from discrimination in education on the grounds of her sex as provided by Title VII of the Civil Rights Act of 1964 as codified, 42 U.S.C. §§ 2000e to 2000e-17.

27. The entity Defendants, despite knowledge and adequate opportunity to learn of the misconduct of their agents and employees, adopted, approved, and ratified these acts, omissions,



and misconduct of Defendants.

WHEREFORE, Plaintiffs pray for relief as after set forth.

**COUNT II**  
**Intentional Infliction of Emotional Distress**  
**(Against Defendant JOHN SIMPSON)**

28. Plaintiff, AMANDA STEWART realleges and incorporates by reference each allegation contained in paragraphs 1 through 24 and Paragraphs 25-26 of Count I, and by such reference, repleads and incorporates them as though fully set fourth here.

29. The conduct of the individual Defendants was intentional, oppressive, malicious and/or in wanton disregard of the rights and feelings of Plaintiffs and constitutes despicable conduct, and by reason thereof, Plaintiffs demand exemplary or punitive damages against the individual Defendants in an amount appropriate to punish them and to deter them and others from such conduct in the future.

WHEREFORE, Plaintiffs pray for relief as hereinafter set forth.

**COUNT III**  
**Intentional Infliction of Emotional Distress**  
**(Against Defendant WESLEY HOLT AND THURMAN BROWN)**

30. Plaintiff, BRIAN BIEZENSKI realleges and incorporates by reference each allegation contained in paragraphs 1 through 24, and by such reference, repleads and incorporates them as though fully set fourth here.

31. The conduct of the individual Defendants was intentional, oppressive, malicious and/or in wanton disregard of the rights and feelings of Plaintiffs and constitutes despicable conduct, and by reason thereof, Plaintiffs demand exemplary or punitive damages against the individual Defendants in an amount appropriate to punish them and to deter them and others from such conduct in the future.

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DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

WHEREFORE, Plaintiffs pray for relief as hereinafter set forth.

**CLAIM FOR RELIEF ON ALL COUNTS**

32. Actual damages;
33. For special damages for mental pain and anguish;
34. For compensatory, general and punitive damages in an amount to be proven at trial;
35. For costs of suit, including reasonable attorney fees;
36. For general damages in the sum according to proof; and
37. For such other and further relief as the court may deem proper in the premises, including but not limited to injunctive relief and court to prevent further and other conduct as alleged.

Respectfully submitted,

RAYMOND L. SANDERS  
215 W. State Street  
Groesbeck, Texas 76642  
Tel: (254) 729-5001  
Fax: (800) 747-1301

By: /s/ Raymond L. Sanders

Raymond L. Sanders  
State Bar No. 24105144  
raymond.sanders454@yahoo.com  
Attorney for Plaintiffs



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Dallas District Office  
207 S. Houston Street, 3rd Floor  
Dallas, TX 75202  
(800) 669-4000  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### **DISMISSAL AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 09/13/2022

To: Ms. Amanda Stewart  
110 Rocky Creek Ave  
Groesbeck, TX 76642  
Charge No: 450-2019-02098

EEOC Representative and email: Dennis Guzman  
EEO Investigator  
[dennis.guzman@eeoc.gov](mailto:dennis.guzman@eeoc.gov)

---

### **DISMISSAL OF CHARGE**

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

### **NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 450-2019-02098.

On behalf of the Commission,

Dennis Guzman  
Digitally signed by Dennis Guzman  
Date: 2023.09.13 12:26:17 -0500

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Travis M. Nicholson  
District Director

CERTIFIED DOCUMENT  
PAGE 9 OF 10  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



## EXHIBIT B



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Dallas District Office  
207 S. Houston Street, 3rd Floor  
Dallas, TX 75202  
(800) 669-4000  
Website: [www.eeoc.gov](http://www.eeoc.gov)

**DISMISSAL AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161 &amp; 161-A)

Issued On: 09/13/2022

To: Mr. Brian Biezenski  
103 Adrian Drive  
Robinson, TX 76706  
Charge No: 450-2019-02097

EEOC Representative and email: Dennis Guzman  
EEO Investigator  
[dennis.guzman@eeoc.gov](mailto:dennis.guzman@eeoc.gov)

**DISMISSAL OF CHARGE**

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

**NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 450-2019-02097.

On behalf of the Commission,

Dennis Guzman Digitally signed by  
Dennis Guzman  
Date: 2022.09.13  
13:09:43 -05'00'

for

Travis M. Nicholson  
District Director

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this 13th day of September, 2022.

A.D.

Jon R. Gimble  
McLennan County, Texas  
By *[Signature]*  
Deputy

CERTIFIED DOCUMENT  
PAGE 10 OF 10  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

**JON R. GIMBLE****DISTRICT CLERK**

MCLENNAN COUNTY COURTHOUSE  
501 Washington Ave., Suite 300 Annex  
WACO, TEXAS 76701  
254-757-5057 OR 757-5054

**REQUEST FOR ISSUANCE**CAUSE NUMBER: 2022-4213-4DATE: 03/10/2023PERSON TO BE SERVED: John Taylor Simpson, IIADDRESS TO SERVE: 212 Northwood Blvd, Corsicana, TX or wherever he may be found.FEES PAID BY: CHECK ☐ CASH ☐ DEBIT ☐ OATH ☐ CREDIT CARD (INCLUDES PROCESSING FEE) ☒**ISSUANCE:**CITATION ☒TRO ☐WRIT OF (SPECIFY) ☐

NOTICE OF HEARING/CONTEMPT \_\_\_\_\_

PROTECTIVE ORDER ☐

OTHER (SPECIFY ) \_\_\_\_\_

**SERVICE:**

DELIVER TO ATTORNEY

215 W. State Street, Groesbeck, Texas 76642

DELIVER TO CONSTABLE \_\_\_\_\_

DELIVER TO PRIVATE PROCESS SERVER (SPECIFY) \_\_\_\_\_

DELIVER TO SHERIFF \_\_\_\_\_

**REQUESTED BY:**  
(PLEASE PRINT)BY Melissa SandersFIRM The Law Office of Raymond L. SandersCONTACT NO. (254) 729-5001

CERTIFIED DOCUMENT  
PAGE 1 OF 1  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this 10th day of March A.D. 2023

Jon R. Gimble  
McLennan County, Texas  
By Nichelle Maddison  
Deputy

**JON R. GIMBLE****DISTRICT CLERK**

McLENNAN COUNTY COURTHOUSE  
501 Washington Ave., Suite 300 Annex  
WACO, TEXAS 76701  
254-757-5057 OR 757-5054

**REQUEST FOR ISSUANCE**CAUSE NUMBER: 2022-4213-4DATE: 03/10/2023PERSON TO BE SERVED: Thurman BrownADDRESS TO SERVE: 203 Frost Creek, Groesbeck, TX or wherever he may be found.FEES PAID BY: CHECK ☐ CASH ☐ DEBIT ☐ OATH ☐ CREDIT CARD (INCLUDES PROCESSING FEE) ☒**ISSUANCE:**CITATION ☒TRO ☐WRIT OF (SPECIFY) ☐

NOTICE OF HEARING/CONTEMPT \_\_\_\_\_

PROTECTIVE ORDER ☐

OTHER (SPECIFY ) \_\_\_\_\_

**SERVICE:**

DELIVER TO ATTORNEY

215 W. State Street, Groesbeck, Texas 76642

DELIVER TO CONSTABLE \_\_\_\_\_

DELIVER TO PRIVATE PROCESS SERVER (SPECIFY) \_\_\_\_\_

DELIVER TO SHERIFF \_\_\_\_\_

**REQUESTED BY:**  
(PLEASE PRINT)BY Melissa SandersFIRM The Law Office of Raymond L. SandersCONTACT NO. (254) 729-5001The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County Texas witness my official hand and seal of  
office this 10 day of March  
A.D. 2023

Jon R. Gimble  
Jon R. Gimble  
McLennan County, Texas  
By Nichelle Maddison  
Deputy

CERTIFIED DOCUMENT  
PAGE 1 OF 1  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**JON R. GIMBLE****DISTRICT CLERK**

McLENNAN COUNTY COURTHOUSE

501 Washington Ave., Suite 300 Annex

WACO, TEXAS 76701

254-757-5057 OR 757-5054

**REQUEST FOR ISSUANCE**CAUSE NUMBER: 2022-4213-4DATE: 03/10/2023PERSON TO BE SERVED: Wesley HoltADDRESS TO SERVE: 200 Cadet Way, Waco, TX 76705 or wherever he may be found.FEES PAID BY: CHECK ☐ CASH ☐ DEBIT ☐ OATH ☐ CREDIT CARD (INCLUDES PROCESSING FEE) ☒**ISSUANCE:**CITATION ☒TRO ☐WRIT OF (SPECIFY) ☐

NOTICE OF HEARING/CONTEMPT \_\_\_\_\_

PROTECTIVE ORDER ☐

OTHER (SPECIFY ) \_\_\_\_\_

**SERVICE:**

DELIVER TO ATTORNEY \_\_\_\_\_

DELIVER TO CONSTABLE \_\_\_\_\_

DELIVER TO PRIVATE PROCESS SERVER (SPECIFY) \_\_\_\_\_

JASON ATTAS: attas@cornerstoneintel.com

DELIVER TO SHERIFF \_\_\_\_\_

**REQUESTED BY:**  
(PLEASE PRINT)BY Melissa SandersFIRM The Law Office of Raymond L. SandersCONTACT NO. (254) 729-5001The State of Texas  
County of McLennanI, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this 10th day of March  
A.D. 2023Jon R. Gimble  
McLennan County, Texas  
By \_\_\_\_\_  
DeputyCERTIFIED DOCUMENT  
PAGE 1 OF 1  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**JON R. GIMBLE**

**DISTRICT CLERK**

MCLENNAN COUNTY COURTHOUSE  
501 Washington Ave., Suite 300 Annex  
WACO, TEXAS 76701  
254-757-5057 OR 757-5054

**REQUEST FOR ISSUANCE**

CAUSE NUMBER: 2022-4213-4 DATE: 03/10/2023

PERSON TO BE SERVED: Connally Independent School District, c/o Superintendent Wesley Holt

ADDRESS TO SERVE: 200 Cadet Way, Waco, TX 76705 or wherever he may be found.

FEES PAID BY: CHECK ☐ CASH ☐ DEBIT ☐ OATH ☐ CREDIT CARD (INCLUDES PROCESSING FEE) ☒

**ISSUANCE:**

CITATION ☒ NOTICE OF HEARING/CONTEMPT \_\_\_\_\_  
TRO ☐ PROTECTIVE ORDER ☐  
WRIT OF (SPECIFY) ☐ OTHER (SPECIFY ) \_\_\_\_\_

**SERVICE:**

DELIVER TO ATTORNEY \_\_\_\_\_  
DELIVER TO CONSTABLE \_\_\_\_\_  
DELIVER TO PRIVATE PROCESS SERVER (SPECIFY) JASON ATTAS: attas@cornerstoneintel.com  
DELIVER TO SHERIFF \_\_\_\_\_

**REQUESTED BY:**  
(PLEASE PRINT)

BY Melissa Sanders  
FIRM The Law Office of Raymond L. Sanders  
CONTACT NO. (254) 729-5001

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this 10 day of March 2023.

Jon R. Gimble  
Jon R. Gimble  
McLennan County, Texas  
By Nichelle Maddison  
Deputy

CERTIFIED DOCUMENT  
PAGE 1 OF 1  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**COPY****CITATION****PAPER# 1  
ATTAS****THE STATE OF TEXAS****Cause No: 2022-4213-4****TO: CONNALLY INDEPENDENT SCHOOL DISTRICT, DEFENDANT - BY SERVING ITS SUPERINTENDENT,  
WESLEY HOLT, 200 CADET WAY, WACO, TEXAS 76705****GREETINGS:**

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

**PARTIES TO THIS ACTION ARE:****AMANDA STEWART AND BRIAN BIEZENSKI**

Plaintiffs

VS.

**CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES**

Defendants

**Court: 170TH JUDICIAL DISTRICT**  
**Pleading: PLAINTIFFS' ORIGINAL PETITION**  
**Pleading File Date: DECEMBER 12, 2022**  
**Cause No: 2022-4213-4**

**NOTICE**

*You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](https://www.texaslawhelp.org)*

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.**  
**Issue Date: APRIL 4, 2023.**

**RAYMOND L. SANDERS**  
**215 W STATE STREET**  
**GROESBECK, TEXAS 76642**  
Attorney for Plaintiffs

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By: Nichelle Maddison, Deputy  
**NICHELLE MADDISON**

**CERTIFIED DOCUMENT**  
**PAGE 1 OF 2**  
**DISTRICT CLERK OF**  
**MCLENNAN COUNTY, TEXAS**

RETURN OF SERVICE

Style: **AMANDA STEWART AND BRIAN BIEZENSKI VS. CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT, THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES**

Cause No: **2022-4213-4**

Court: **170TH JUDICIAL DISTRICT**

Paper#: **1**

Pleading: **PLAINTIFFS' ORIGINAL PETITION**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. and executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by delivering to the party designated in the citation, to-wit:

at \_\_\_\_\_ o'clock \_\_\_\_ M; in person, a true copy of this citation with a true and correct copy of the pleading attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy

Total \$ \_\_\_\_\_ **NO SHERIFF OR CONSTABLE** \_\_\_\_\_ County, Texas  
**FEES COLLECTED**

By \_\_\_\_\_

**NOT EXECUTED FOR THE FOLLOWING REASONS** \_\_\_\_\_

and having attempted on \_\_\_\_\_

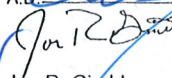
"My name is \_\_\_\_\_ (First) \_\_\_\_\_ (Middle) \_\_\_\_\_ (Last), my date of birth is \_\_\_\_\_, and my address is \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct. Executed in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_ (Month) \_\_\_\_\_ (Year)

\_\_\_\_\_  
(Signature) Declarant"

The State of Texas  
County of McLennan

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Jon R. Gimble  
McLennan County, Texas  
By \_\_\_\_\_  
Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**CITATION**

**PAPER# 2  
ATTY/MAIL**

**THE STATE OF TEXAS**

**COPY**

**Cause No: 2022-4213-4**

**TO: JOHN SIMPSON, DEFENDANT**

**GREETINGS:**

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

**PARTIES TO THIS ACTION ARE:**

**AMANDA STEWART AND BRIAN BIEZENSKI**

Plaintiffs

**VS.**

**CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES**

Defendants

**Court: 170TH JUDICIAL DISTRICT**

**Pleading: PLAINTIFFS' ORIGINAL PETITION**

**Pleading File Date: DECEMBER 12, 2022**

**Cause No: 2022-4213-4**

**NOTICE**

***You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org***

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas,**

**Issue Date: APRIL 4, 2023.**

**RAYMOND L. SANDERS  
215 W STATE STREET  
GROESBECK, TEXAS 76642  
Attorney for Plaintiffs**

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By: Nichelle Maddison, Deputy  
**NICHELLE MADDISON**

**CERTIFIED DOCUMENT  
PAGE 1 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS**

RETURN OF SERVICE

Style: AMANDA STEWART AND BRIAN BIEZENSKI VS. CONNALLY INDEPENDENT SCHOOL DISTRICT,  
WESLEY HOLT, THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES

Cause No: 2022-4213-4

Court: 170TH JUDICIAL DISTRICT

Paper#: 2

Pleading: PLAINTIFFS' ORIGINAL PETITION

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M. and executed on the \_\_\_\_\_  
day of \_\_\_\_\_, 20\_\_\_\_ by delivering to the party designated in the citation, to-wit:

at \_\_\_\_\_ o'clock \_\_\_\_\_ M; in person, a true copy of this citation with a true and correct copy of the pleading attached  
thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy

Total \$ \_\_\_\_\_ County, Texas

NO SHERIFF OR CONSTABLE  
FEES COLLECTED

By \_\_\_\_\_

NOT EXECUTED FOR THE FOLLOWING REASONS \_\_\_\_\_

and having attempted on \_\_\_\_\_

"My name is \_\_\_\_\_ (First) \_\_\_\_\_ (Middle) \_\_\_\_\_ (Last), my  
date of birth is \_\_\_\_\_, and my address is \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct. Executed in \_\_\_\_\_ County, State  
of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_ (Month) \_\_\_\_\_ (Year)

\_\_\_\_\_  
(Signature) Declarant"

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this \_\_\_\_\_ day of \_\_\_\_\_  
A.D. \_\_\_\_\_

Jon R. Gimble  
McLennan County, Texas  
By \_\_\_\_\_  
Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**CITATION**

**PAPER# 3  
ATTY/MAIL**

**THE STATE OF TEXAS**

**COPY**

**Cause No: 2022-4213-4**

**TO: THURMAN BROWN, DEFENDANT**

**GREETINGS:**

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

**PARTIES TO THIS ACTION ARE:**

**AMANDA STEWART AND BRIAN BIEZENSKI**

Plaintiffs

**VS.**

**CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES**

Defendants

Court: **170TH JUDICIAL DISTRICT**  
Pleading: **PLAINTIFFS' ORIGINAL PETITION**  
Pleading File Date: **DECEMBER 12, 2022**  
Cause No: **2022-4213-4**

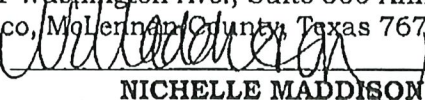
**NOTICE**

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The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.**  
Issue Date: **APRIL 4, 2023.**

**RAYMOND L. SANDERS**  
**215 W STATE STREET**  
**GROESBECK, TEXAS 76642**  
Attorney for Plaintiffs

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By: , Deputy  
**NICHELLE MADDISON**

**CERTIFIED DOCUMENT**  
**PAGE 1 OF 2**  
**DISTRICT CLERK OF**  
**McLENNAN COUNTY, TEXAS**

RETURN OF SERVICE

Style: **AMANDA STEWART AND BRIAN BIEZENSKI VS. CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT, THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES**  
Cause No: **2022-4213-4**  
Court: **170TH JUDICIAL DISTRICT**  
Paper#: **3**  
Pleading: **PLAINTIFFS' ORIGINAL PETITION**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. and executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by delivering to the party designated in the citation, to-wit:

at \_\_\_\_\_ o'clock \_\_\_\_ M; in person, a true copy of this citation with a true and correct copy of the pleading attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy

Total \$ \_\_\_\_\_ **NO SHERIFF OR CONSTABLE FEES COLLECTED** \_\_\_\_\_ County, Texas

By \_\_\_\_\_

**NOT EXECUTED FOR THE FOLLOWING REASONS** \_\_\_\_\_

and having attempted on \_\_\_\_\_

"My name is \_\_\_\_\_ (First) \_\_\_\_\_ (Middle) \_\_\_\_\_ (Last), my date of birth is \_\_\_\_\_, and my address is \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct. Executed in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_ (Month) \_\_\_\_\_ (Year)

\_\_\_\_\_  
(Signature) Declarant"

The State of Texas  
County of McLennan  
I, Jon R. Gimble, Clerk of the District Court of McLennan County Texas do hereby certify that the foregoing is a true and correct copy of the original as the same appears on file in the District Court, McLennan County, Texas witness my official hand and seal of office this \_\_\_\_\_ day of \_\_\_\_\_ A.D. \_\_\_\_\_  
Jon R. Gimble  
McLennan County, Texas  
By \_\_\_\_\_ Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**CITATION**

**COPY**

**PAPER# 4  
ATTAS**

**THE STATE OF TEXAS**

**Cause No: 2022-4213-4**

**TO: WESLEY HOLT, DEFENDANT - 200 CADET WAY, WACO, TEXAS 76705**

**GREETINGS:**

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

**PARTIES TO THIS ACTION ARE:**

**AMANDA STEWART AND BRIAN BIEZENSKI**

Plaintiffs

**VS.**

**CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES**

Defendants

**Court: 170TH JUDICIAL DISTRICT**

**Pleading: PLAINTIFFS' ORIGINAL PETITION**

**Pleading File Date: DECEMBER 12, 2022**

**Cause No: 2022-4213-4**

**NOTICE**

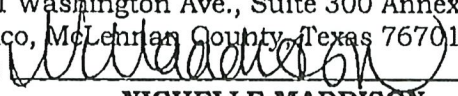
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**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.**

**Issue Date: APRIL 4, 2023.**

**RAYMOND L. SANDERS  
215 W STATE STREET  
GROESBECK, TEXAS 76642  
Attorney for Plaintiffs**

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By: , Deputy  
**NICHELLE MADDISON**

**CERTIFIED DOCUMENT  
PAGE 1 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS**

RETURN OF SERVICE

Style: **AMANDA STEWART AND BRIAN BIEZENSKI VS. CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT, THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES**  
Cause No: **2022-4213-4**  
Court: **170TH JUDICIAL DISTRICT**  
Paper#: **4**  
Pleading: **PLAINTIFFS' ORIGINAL PETITION**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. and executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by delivering to the party designated in the citation, to-wit:

at \_\_\_\_\_ o'clock \_\_\_\_ M; in person, a true copy of this citation with a true and correct copy of the pleading attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy

Total \$ \_\_\_\_\_ County, Texas

NO SHERIFF OR CONSTABLE  
FEES COLLECTED

By \_\_\_\_\_

NOT EXECUTED FOR THE FOLLOWING REASONS \_\_\_\_\_

and having attempted on \_\_\_\_\_

"My name is \_\_\_\_\_ (First) \_\_\_\_\_ (Middle) \_\_\_\_\_ (Last), my date of birth is \_\_\_\_\_, and my address is \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct. Executed in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_ (Month) \_\_\_\_\_ (Year)

\_\_\_\_\_  
(Signature) Declarant"

The State of Texas  
County of McLennan

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A.D. \_\_\_\_\_

Jon R. Gimble  
McLennan County, Texas  
By \_\_\_\_\_  
Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



**AFFIDAVIT  
ATTACHED**

**CITATION**

**PAPER# 4  
ATTAS**

**THE STATE OF TEXAS**

**Cause No: 2022-4213-4**

**TO: WESLEY HOLT, DEFENDANT - 200 CADET WAY, WACO, TEXAS 76705**

FILED  
MCLENNAN COUNTY  
4/11/2023 2:12 PM  
JON R. GIMBLE  
DISTRICT CLERK  
Nichelle Maddison

**GREETINGS:**

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

**PARTIES TO THIS ACTION ARE:**

**AMANDA STEWART AND BRIAN BIEZENSKI**

Plaintiffs

**VS.**

**CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES**

Defendants

Court: **170TH JUDICIAL DISTRICT**  
Pleading: **PLAINTIFFS' ORIGINAL PETITION**  
Pleading File Date: **DECEMBER 12, 2022**  
Cause No: **2022-4213-4**

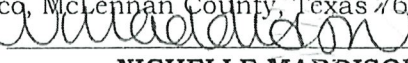
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**ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.**  
Issue Date: **APRIL 4, 2023.**

**RAYMOND L. SANDERS**  
**215 W STATE STREET**  
**GROESBECK, TEXAS 76642**  
Attorney for Plaintiffs

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By: , Deputy  
**NICHELLE MADDISON**

**CERTIFIED DOCUMENT**  
**PAGE 1 OF 2**  
**DISTRICT CLERK OF**  
**MCLENNAN COUNTY, TEXAS**

CAUSE NO. 2022-4213-4

AMANDA STEWART AND BRIAN BIEZENSKI

Plaintiff,

VS.

CONALLY INDEPENDENT SCHOOL DISTRICT, WESLEY  
HOLT, THURMAN BROWN, AND JOHN SIMPSON

Defendant.

§  
§  
§  
§  
§  
§

IN THE COURT OF

MCLENNAN COUNTY, TEXAS

170TH JUDICIAL DISTRICT COURT

AFFIDAVIT OF SERVICE

"The following came to hand on Apr 11, 2023, 10:00 am,

CITATION, PLAINTIFF'S ORIGINAL PETITION, EXHIBITS A-B,

and was executed at 200 CADET WAY, WACO, TX 76705 within the county of MCLENNAN at 11:26 AM on Tue, Apr 11 2023, by delivering a true copy to the within named

WESLEY HOLT, DEFENDANT

in person, having first endorsed the date of delivery on same.

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

My name is Jason M. Attas, P.I., my date of birth is May, 1975, and my address is 400 Austin Avenue Suite 101, Waco, TX 76701, and United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in McLennan County, State of TX, on April 11, 2023.

  
Jason M. Attas, P.I.

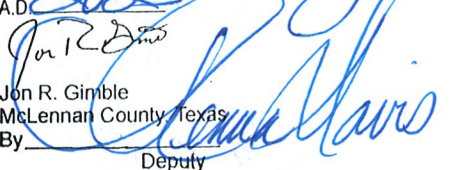
Certification Number: PSC11371

Certification Expiration: 2/28/24

attas@cornerstoneintel.com

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this the 12th day of April  
A.D. 2023

Jon R. Gimble  
McLennan County, Texas  
By   
Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



CITATION

AFFIDAVIT  
ATTACHEDFILED  
MCLENNAN COUNTY  
4/11/2023 2:12 PM  
JON R. GIMBLE  
DISTRICT CLERK  
Nichelle MaddisonPAPER# 1  
ATTAS

THE STATE OF TEXAS

Cause No: 2022-4213-4

TO: CONNALLY INDEPENDENT SCHOOL DISTRICT, DEFENDANT - BY SERVING ITS SUPERINTENDENT,  
WESLEY HOLT, 200 CADET WAY, WACO, TEXAS 76705

GREETINGS:

**YOU ARE HEREBY COMMANDED** to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, in the cause number described below on the docket of said court, and styled,

PARTIES TO THIS ACTION ARE:

AMANDA STEWART AND BRIAN BIEZENSKI

Plaintiffs

VS.

CONNALLY INDEPENDENT SCHOOL DISTRICT, WESLEY HOLT,  
THURMAN BROWN, AND JOHN SIMPSON, IN THEIR INDIVIDUAL AND  
OFFICIAL CAPACITIES

Defendants

Court: 170TH JUDICIAL DISTRICT  
Pleading: PLAINTIFFS' ORIGINAL PETITION  
Pleading File Date: DECEMBER 12, 2022  
Cause No: 2022-4213-4

## NOTICE

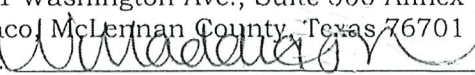
*You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](https://www.texaslawhelp.org)*

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.

Issue Date: APRIL 4, 2023.

RAYMOND L. SANDERS  
215 W STATE STREET  
GROESBECK, TEXAS 76642  
Attorney for Plaintiffs

Jon R. Gimble, District Clerk  
501 Washington Ave., Suite 300 Annex  
Waco, McLennan County, Texas 76701  
By:  , Deputy  
NICHELLE MADDISON

CERTIFIED DOCUMENT  
PAGE 1 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

11

CAUSE NO. 2022-4213-4

AMANDA STEWART AND BRIAN BIEZENSKI

Plaintiff,

VS.

CONALLY INDEPENDENT SCHOOL DISTRICT, WESLEY  
HOLT, THURMAN BROWN, AND JOHN SIMPSON  
Defendant.

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IN THE COURT OF

MCLENNAN COUNTY, TEXAS

170TH JUDICIAL DISTRICT COURT

AFFIDAVIT OF SERVICE

"The following came to hand on Apr 11, 2023, 10:00 am,

CITATION, PLAINTIFF'S ORIGINAL PETITION, EXHIBITS A-B,

and was executed at 200 CADET WAY, WACO, TX 76705 within the county of MCLENNAN at 11:26 AM on Tue, Apr 11 2023, by delivering a true copy to the within named

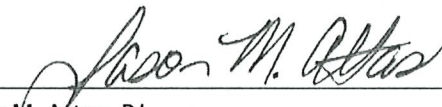
WESLEY HOLT, SUPERINTENDENT, CONNALLY INDEPENDENT SCHOOL DISTRICT

in person, having first endorsed the date of delivery on same.

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

My name is Jason M. Attas, P.I., my date of birth is May, 1975, and my address is 400 Austin Avenue Suite 101, Waco, TX 76701, and United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in McLennan County, State of TX, on April 11, 2023.

  
Jason M. Attas, P.I.

Certification Number: PSC11371

Certification Expiration: 2/28/24

attas@cornerstoneintel.com

The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this the 11th day of April  
A.D. 2023

  
Jon R. Gimble  
McLennan County, Texas  
By  Deputy

CERTIFIED DOCUMENT  
PAGE 2 OF 2  
DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS

FILED  
MCLENNAN COUNTY  
4/24/2023 10:32 AM  
JON R. GIMBLE  
DISTRICT CLERK  
Rosa Perez

CAUSE NO. 2022-4213-4

AMANDA STEWART & BRIAN BIEZENSKI

*Plaintiff(s),*

v.

CONNALY INDEPENDENT SCHOOL  
DISTRICT, real persons, WESLEY HOLT,  
THURMAN BROWN, & JOHN SIMPSON, in  
their individual & official capacities

*Defendant(s).*

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IN THE 170TH DISTRICT COURT

OF

MCLENNAN COUNTY, TEXAS

**AFFIDAVIT OF SERVICE**

I, Nancy Dixon, being duly sworn, state:

I am not a party to or interested in the outcome of this suit.

I received the following documents on April 19, 2023 at 6:48 pm. I delivered these documents on John Simpson in Navarro County, TX on April 20, 2023 at 5:22 pm at 212 Northwood Blvd, Corsicana, TX 75110 by personal service by handing the following documents to an individual identified as John Simpson.

Citation and Plaintiffs' Original Petition with Exhibits A-B

Additional Description:

I delivered the documents to John Simpson.

White Male, est. age 40, glasses: N, No Hair hair, 200 lbs to 220 lbs, 6' to 6' 3".

Geolocation of Serve: <https://google.com/maps?q=32.0989685059,-96.4664368651>

Photograph: See Exhibit 1

My name is Nancy Dixon, my date of birth is 5/17/1945, and my address is 3007 Rock Road, Corsicana, TX 75109, and USA.

I declare under penalty of perjury that the foregoing is true and correct.

CERTIFIED DOCUMENT  
PAGE 1 OF 4  
DISTRICT CLERK OF  
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Executed in

Navarro County,

TX on 4/21/2023.

*/s/ Nancy Dixon*

Nancy Dixon

(214) 507-7961

Certification Number: PSC-17397

Expiration Date: 10/31/2023

CERTIFIED DOCUMENT  
PAGE 2 OF 4  
DISTRICT CLERK OF  
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# Exhibit 1

Exhibit 1a)



CERTIFIED DOCUMENT  
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MCLENNAN COUNTY, TEXAS



Exhibit 1b)



CERTIFIED DOCUMENT  
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DISTRICT CLERK OF  
MCLENNAN COUNTY, TEXAS



The State of Texas  
County of McLennan

I, Jon R. Gimble, Clerk of the District Court of McLennan County  
Texas do hereby certify that the foregoing is a true and correct  
copy of the original as the same appears on file in the District  
Court, McLennan County, Texas witness my official hand and seal of  
office this 16 day of

A.D.

Jon R. Gimble  
McLennan County, Texas  
By

Deputy